

1 John S. Delikanakis (NV Bar #5928)  
2 Skylar Arakawa-Pamphilon (NV Bar #15864)  
3 SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
4 Las Vegas, NV 89169  
Telephone: 702.784.5200  
5 Facsimile: 702.784.5252  
Email: jdelikanakis@swlaw.com  
sarakawapamphilon@swlaw.com

6 *Attorneys for Defendants Bank of America, N.A. and*  
7 *Chex Systems, Inc.*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 LYNEECE JAMES,

11 Plaintiff,

12 vs.

13 CHEX SYSTEMS, INC.; and BANK OF  
14 AMERICA, N.A.,

15 Defendants.

Case No.: 2:23-CV-00073-JCM-VCF

16 **STIPULATION TO EXTEND**  
**DEADLINE TO RESPOND TO**  
**PLAINTIFF'S**  
**COMPLAINT [ECF NO. 1]**  
**(FIRST REQUEST)**

17 Pursuant to LR IA 6-1 and LR IA 6-2, Defendants Chex Systems, Inc. ("CHEX") and Bank  
18 of America, N.A. ("BANA," and collectively with CHEX, "Defendants"), by and through their  
19 attorneys of record, and Plaintiff Lyniece James ("Plaintiff"), by and through Plaintiff's counsel  
20 of record, submit this Stipulation and Proposed Order, based on the following:

21 ///

1. Plaintiff filed the Complaint on January 12, 2023 [ECF No. 1].

2. Both Defendants were served with Plaintiff's Complaint, and their responsive pleadings are due on February 7, 2023.

3. Defendants have requested that the deadline for Defendants to file an answer to Plaintiff's Complaint be extended by twenty (20) days up to and including February 27, 2023.

4. This request for an extension is made in good faith and is not intended to cause any delay or prejudice to any party. The reason for this request is to provide Defendants sufficient time to evaluate and respond to the allegations set forth in the Complaint and to allow time for the Parties to engage in settlement negotiations.

5. Counsel for Defendants reached out to counsel for Plaintiff on February 6, 2023 requesting the extension. Plaintiff's counsel has responded and consents to this request.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the deadline for Defendants to file respond to Plaintiff's Complaint shall be Monday, February 27, 2023.

**IT IS SO STIPULATED.**

Dated: February 7, 2023

FREEDOM LAW FIRM

/s/ George Haines

George Haines, Esq. (NV Bar #9411)  
Gerardo Avalos, Esq. (NV Bar #15171)  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, Nevada 89123

*Attorneys for Plaintiff Lyneece James*

Dated: February 7, 2023

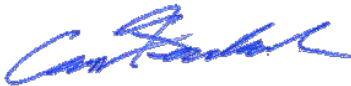
SNELL & WILMER L.L.P.

/s/ John S. Delikanakis

John S. Delikanakis, Esq. (NV Bar #5928)  
Skylar Arakawa-Pamphilon (NV Bar #15864)  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169

*Attorneys for Defendants Bank of America,  
N.A. and Chex Systems, Inc.*

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge

DATED 2-8-2023

Snell & Wilmer  
L.L.P.  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT [ECF NO. 1]** by method indicated below:

- ☒ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

and addressed to the following:

George Haines, Esq.  
Gerardo Avalos, Esq.  
Freedom Law Firm  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, NV 89123

DATED this 7th day of February, 2023

/s/ Michelle Shypkoski  
An employee of SNELL & WILMER L.L.P.

4859-2379-5023